Federal Communications Commission
Washington, DC 20554

In regards to:	)	
	)	
Amendment of Part 97 of the Commission's	)	RM-11625
Rules to Facilitate use in the Amateur Radio	)	
Service of Single Slot Time Division Multiple	)	
Access (TDMA) Telephony and Data Emissions	)	

To the Commission:

I am writing to the commission in support for the petition for rule making filed by the Amateur Radio Relay League to facilitate the use of newer digital telephony and data emissions at and above 50 MHz in particular the use of single slot TDMA under part 97 of the Commission's rules. I urge the commission based upon my personal and professional opinion to adopt this proposal for the following reasons:

The proposed changes remove a long existing ambiguity in Part 97 concerning the use of single slot TDMA technology in the Amateur Radio Service. Amateur Radio itself in some geographic locations suffers from tremendous spectrum crowding issues due to interference as do Part 80, 87, and 90 users as well as existing upon a secondary use basis on several bands above 50 MHz.

I encourage the use of spectrum efficient digital repeaters and simplex use of D-STAR, P25 (Phase 1 & 2), DMR, NXDN and other similar technologies due to the fact that they have specific specifications that can accomplish that goal and ease congestion.

The proposed changes enable and encourage the adoption of spectrally-efficient narrow-band technologies. In the case of DMR, it can also provide a smooth upgrade path for analog users with the use of mixed mode repeaters in one unit. Implementation of digital TDMA technology has been successful in the Land Mobile Radio service, and easily, with careful spectral planning, can co-exist with adjacent analog operation without interference.

These changes would have little to no negative impact on the amateur radio community and would allow amateurs to experiment with newer technologies. The spectral efficiency of TDMA is a bonus for certain regions. The use of the above mentioned TDMA and similar modes would also have applications in emergency communications and recovery efforts on U.S. soil.

I am currently a Communications Systems Specialist in the LMR field working for and with first responders at the State level. My background consists of an A.A.S. In Electrical Engineering, GROL with Ship RADAR endorsement and three years of working experience with Motorola SmartNet/Zone Systems for first responders. I am also an extra class amateur radio operator of two years with the call sign AA3A. I feel that this ruling is important both personally and professionally and I am in full support of the changes that have been brought forward by the ARRL and other Amateur groups both in the U.S. and in Europe.

Sincerely Submitted,
Martin E. Keefe
PG00036527
AA3A